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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

Jane M. Patarcity
Beazer East, Inc.
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219

November 29, 1995

Re: Request to Perform Risk Assessments
Koppers Company, Inc. Site
Newport, Delaware

Dear Jane:

EPA has reviewed the request made by Beazer East, Inc. (Beazer) and E.I. duPont de Nemours and Company, Inc. (DuPont) to perform the Human Health and Ecological Risk Assessments dated August 30, 1995. Based on the Region's review of this request and in consultation with EPA Headquarters, EPA is granting approval for Beazer and DuPont to perform the Human Health Risk Assessment at the subject site.

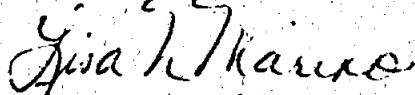
EPA has reviewed the Statement of Qualifications (SOQ) submitted by Beazer, DuPont and Environmental Standards, Inc. (ESI). EPA believes that the proposed contractor, ESI, is knowledgeable of current Superfund risk assessment processes and guidance documents and has sufficient experience to conduct the Human Health Risk Assessment. In addition, EPA agrees that we have made significant improvements in our working relationship and ability to communicate over the past couple of years. Therefore, EPA is currently drafting an amendment to the Administrative Order on Consent (AOC) which will allow Beazer and DuPont to conduct the Human Health Risk Assessment. This amendment will reference the interim meetings/deliverables mentioned in your August 30, 1995 request and will be forwarded to Beazer and DuPont for review in the near future.

Regarding the Ecological Risk Assessment (ERA), EPA has also reviewed the SOQ submitted by Beazer, DuPont, and Woodward-Clyde Consultants (WVC). While EPA agrees that WVC has sufficient knowledge and experience to conduct the ERA, EPA is concerned over the amount of recurring comments forwarded to WVC regarding ecological issues over the past several years. Issues such as background sample locations, adequate characterization of contamination, and decision criteria continue to be concerns expressed by EPA's Biological Technical Assistance Group (BTAG). Therefore, based on our past experience which has involved numerous disagreements over ecological issues, EPA will retain responsibility for conducting the ERA as detailed in the AOC. Mr. Mark Sprenger and Ms. Nancy Finley of EPA's Environmental Response Team in Edison, New Jersey will be in charge of conducting the ERA for the site.

AR310125

Please do not hesitate to call with any questions or comments on this matter.

Sincerely,



Lisa M. Marino, RPM
General Remedial Section

cc:

J. Karmazyn, DuPont
J. Buczala, WWC
M. Zhang, DNREC
B. Okorn, EPA
J. Hubbard, EPA
S. Fairchild, EPA
M. Sprenger, EPA
N. Finley, EPA

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